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Plaintiff *Pro Se*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
KATTEN MUCHIN ROSENMAN LLP,

Plaintiff,

- against -

KAYVAN HAKIM, YASSMINE HAKIM and GREAT
NORTHERN INSURANCE COMPANY,

Defendants.
----- X

Case No. 07-CV-2921 (BSJ)

**AFFIDAVIT OF
PHILIP A. NEMECEK
IN OPPOSITION TO
GNIC'S MOTION FOR
SUMMARY JUDGMENT**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Philip A. Nemecek, being duly sworn, deposes and says:

1. I am a member of the law firm of Katten Muchin Rosenman LLP, the *pro se* plaintiff in the above-captioned action and, as such, I am fully familiar with all the facts and circumstances heretofore had herein.

2. This affidavit is respectfully submitted in opposition to Great Northern Insurance Company's motion for summary judgment, pursuant to Fed. R. Civ. P. 56.

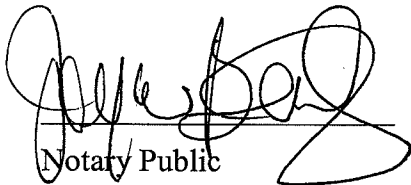
3. Attached hereto as Exhibit A is the February 14, 2007 letter of David J. Mark, attorney for Defendants Kayvan and Yassmine Hakim (the "Hakims"), to Katten.

4. Attached hereto as Exhibit B is the February 21, 2007 letter of David J. Mark to Katten.
5. Attached hereto as Exhibits C and D, respectively, are the affidavits of service attesting to service of the Summons and Complaint on the Hakims.
6. Attached hereto as Exhibit E is the May 24, 2007 receipt of the Clerk of the Court memorializing the deposit of the disputed Escrow Funds into the Court.
7. Attached hereto as Exhibit F is the May 31, 2007 Answer with Cross-Claims filed by the Hakims.



PHILIP A. NEMECEK

Sworn to before me this
4th day of June, 2007



Notary Public

JOYCE BENTLEY
Notary Public, State of New York
No. 01BE4673410
Qualified in Kings County
Certificate Filed in New York County
Commission Expires September 30, 2010